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To: dwear@fs.fed.us, jgreis@fs.fed.us
cc:
Subject: comments on SFRA

130 Tabor Road
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865-481-0286

February 27, 2002

David N. Wear
USDA Forest Service
Research Triangle Park, NC

John G. Greis
USDA Forest Service
Atlanta, GA

Dear Mr. Wear and Mr. Greis:

I am writing on behalf of Tennessee Citizens for Wilderness Planning, a group of over 400 individuals based primarily in East Tennessee. Our mission is the preservation of wild and natural areas, particularly the Appalachian and Cumberland Mountain areas in Tennessee. I reviewed the executive summary and summary of the Southern Forest Resource Assessment with great interest and, in general, think you did a fine job.

I have a few concerns, however. I think the report tends to deflect attention away from the findings in the report that are damaging to the timber industry by stating that the biggest problem is sprawl. The study projects hardwood harvest increases in Tennessee of 100-200 percent. This seems like a big issue to me and yet it gets lost in the report.

Under broad findings in the executive summary, you state that total forest area will remain stable with subregional and compositional changes. I think this is somewhat misleading, in that you are not making enough of a distinction between a planted pine plantation and a natural forest. Your report states that these plantations don't compare ecologically with a natural forest ("pine plantations generally provide poor wildlife habitat"). Yet you ignore this and lump pine plantations in with natural forests when you say that only a small amount of forest will be lost by 2040. While strictly accurate, the way you write this it downplays the potential seriousness of the loss. In truth, we are projected to lose 25 million acres of natural forest by 2040 if your projections are correct. The implications to wildlife could be enormous. I was particularly interested in your findings on the economic base of communities where the paper industry predominates. These findings (low median income, high poverty and unemployment rates) support TCWP's contention that chip mills and the associated harvest do little to bolster the economy in some of our poor rural areas. Conversely, tourism and recreation based communities have more favorable economic conditions. This also is downplayed in your report and diluted by use of number and percentage of jobs and amount and percentage of income. What you fail to mention is that timber jobs and that income shift from place to place. This is an important point for people living in or near some of our forested areas. In particular, the sustainability of the tourist-based economy should be mentioned. I am from the Pacific Northwest and the impact to the logging communities from the overharvest in that area has been severe. The harvest practices in the south today mimic those in the Northwest. They do not sustain a community, but instead the practice is to move from one area to another and harvest there until all the logs are gone. A sustainable timber base is one that provides jobs for the surrounding community on an ongoing basis, not one that provides jobs as long as you're willing to pack up and move.

Another concern I have is about the sustainability of timber production. I don't know for certain, but I suspect that the longer you use a particular piece of land the lower the amount of timber you are able to harvest using today's practices. I have heard that it takes more and more fertilizers and pesticides each

crop cycle to produce the same amount of timber in an area and at some point the timber production drops off regardless of the amount of fertilizer. I don't believe this is sustainable and the potential for damage from these chemicals, in particular to the water supply, is frightening. Please consider including more information on this in your report. This could be an important consideration in making decisions about where to place pine plantations in the future.

At the very end of the summary in your Knowledge Gaps and Uncertainties section, you make several statements that I would like to see highlighted in the executive summary. These issues are key to future management of forests and need to be emphasized.

You state in the very beginning that the information provided in the report should help to improve public policies. In that light, this is a very important report. Please make sure that you are not downplaying the impact of the potential loss of 25 million acres of natural forest. Also please ensure that the report makes it clear that the jobs provided by logging tend to shift from one community to another if an area is overharvested.

Thank you for the opportunity to comment. I look forward to reviewing your final report.

Sincerely,
Marcy R. Reed
Executive Director